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Wells Fargo Bank, N.A.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CHARLES P. HAGGARTY and GINA M.
HAGGARTY, on behalf of themselves and all
others similarly situated,

Plaintiffs,

vs.

WELLS FARGO BANK, N.A.,

Defendant.

Case No.: 3:10-cv-02416-CRB

**STIPULATION AND ~~PROPOSED~~ ORDER
TO CONTINUE EXPERT WITNESS
DEADLINES**

First Amended
Complaint Filed: November 5, 2010

Honorable Charles R. Breyer
Honorable Jacqueline Scott Corley

Pursuant to Civil L. R. 7-12, Plaintiffs CHARLES P. HAGGARTY and GINA M. HAGGARTY, and Defendant WELLS FARGO BANK, N.A., having met and conferred through their counsel of record, submit this Joint Stipulation and Proposed Order concerning changes to the expert witness deadlines in this matter.

RECITAL

WHEREAS, the following dates are currently scheduled in this matter:

- | | | |
|----|---|--------------------|
| 1. | Trial Date | December 3, 2012 |
| 2. | Pre-Trial Conference | November 27, 2012 |
| 3. | Hearing on Motion for Class Certification | September 28, 2012 |
| 4. | Hearing on Motion for Judgment on the Pleadings | August 31, 2012 |
| 5. | Fact Discovery Cutoff: | August 22, 2012 |
| 6. | Initial Expert Disclosures: | August 31, 2012 |
| 7. | Rebuttal Expert Disclosures: | September 14, 2012 |
| 8. | Expert Discovery Cutoff: | September 28, 2012 |

WHEREAS, the parties are currently engaged in discovery and have agreed that that it is the parties' best interests and the interests of judicial economy to extend the expert witness deadlines in this matter.

STIPULATION

THEREFORE, the parties agree through their respective attorneys that expert witness deadlines currently in place shall be extend by 14 days, as follows:

Parties' Proposed Changes To Expert Witness Deadlines

- | | <u>Present Date</u> | <u>Proposed Date</u> |
|---|---------------------|----------------------|
| 1. Initial Expert Disclosures:
At the time of disclosure, the disclosing party will provide 3 dates between Sept. 14-Sept. 28, 2012 that the disclosed expert is available for deposition. | August 31, 2012 | September 14, 2012 |
| 2. Rebuttal Expert Disclosures:
At the time of disclosure, the disclosing party will provide | September 14, 2012 | September 28, 2012 |

3 dates between Sept. 28-Oct. 12,
2012 that the disclosed expert
is available for deposition.

3. Expert Discovery Cutoff: September 28, 2012 October 12, 2012

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated: August 3, 2012

Respectfully submitted
McCUNE WRIGHT, LLP

By: /s/ Richard D. McCune
Richard D. McCune

Attorney for Plaintiffs
Charles P. Haggarty and Gina M. Haggarty.

Dated: August 3, 2012

REED SMITH, LLP

By: /s/ Jack R. Nelson
Jack R. Nelson

Attorneys for Defendant
Wells Fargo Bank, N.A.

PURSUANT TO STIPULATION, IT IS SO ORDERED:

DATE: August 6, 2012

Honorable Charles R. Breyer
United States District Court
Northern District of California
IT IS SO ORDERED
[Signature]
Judge Charles R. Breyer